

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Wenzhen Gao a/k/a Wen Gao a/k/a Wen Zhen Gao,

Plaintiff,

-against-

Citibank N.A.; The Goldman Sachs Group, Inc.; Capital  
One Financial Corporation; American Express Company;  
Trans Union LLC a/k/a TransUnion; Experian  
Information Solutions, Inc.; and Equifax Information  
Services LLC,

Defendants.

Case No.: 1:25-cv-03075-JPC

**NOTICE OF SETTLEMENT**

Now comes Wenzhen Gao a/k/a Wen Gao a/k/a Wen Zhen Gao (“Plaintiff”) by and through counsel, to provide notice to the Court that the present cause has been settled between the Plaintiff and Defendant American Express Company, and states:

1. A settlement agreement (“Agreement”) is in the process of being finalized. Once the Agreement is fully executed, and Plaintiff has received the consideration required pursuant to the Agreement, the parties will submit a Stipulation of Voluntary Dismissal with prejudice pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii).

2. The parties respectfully request that the Court stays this case and adjourns all deadlines and conferences as they pertain to American Express Company, and request the Court provide that the parties may seek to reopen the matter for forty-five (45) days to assure that the Agreement is executed, and all terms of settlement have been consummated.

Dated: Brooklyn, New York  
May 19, 2025

**PETROFF AMSHEN LLP**

*Attorneys for Plaintiff,*

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/s/ Serge F. Petroff

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